

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Service Rules for the 698-746, 747-762	)	WT Docket No. 06-150
and 777-792 MHz Bands	)	
	)	
Revision of the Commission's Rules to	)	CC Docket No. 94-102
Ensure	)	
Compatibility with Enhanced 911	)	
Emergency	)	
Calling Systems	)	WT Docket No. 01-309
	)	
Section 68.4(a) of the Commission's	)	
Rules	)	WT Docket No. 03-264
Governing Hearing Aid-Compatible	)	
Telephones	)	
	)	
Biennial Regulatory Review –	)	
Amendment of Parts 1, 22, 24, 27, and	)	WT Docket No. 06-169
90 to Streamline and Harmonize	)	
Various Rules Affecting Wireless Radio	)	
Services	)	
	)	
Former Nextel	)	PS Docket No. 06-229
Communications, Inc. Upper	)	
700 MHz Guard Band Licenses	)	
and Revisions to Part 27 of the	)	
Commission's Rules	)	WT Docket No. 96-86
	)	
Implementing a Nationwide,	)	
Broadband, Interoperable	)	
Public Safety Network in the		
700 MHz Band		
Development of Operational, Technical		
and Spectrum Requirements for		
Meeting Federal, State and Local Public		
Safety Communications Requirements		
Through the Year 2010		

## COMMENTS OF RONALD G. MAYWORM

To the Commission: I welcome the opportunity to present these comments in the above-captioned proceeding.

By way of introduction, I am the Radio System Manager for the City of Bryan, Texas, with more than 46 years experience in radio communications, the last 20 of which have been directly in public safety communications. I am also the Chairman of the Region 49 (Central Texas) 700 MHz and 800 MHz Regional Planning Committees (RPCs), Vice-Chairman of the RPC Committee of the National Public Safety Telecommunications Council (NPSTC), and Chairman of the Board of Managers of the Brazos County, Texas, Emergency Communications District. For several years I actively participated in the National Coordination Committee (NCC) process, which provided recommendations to the Commission resulting in the current rules governing the 700 MHz public safety band.

I agree with the Commission that a broadband allocation for nationwide public safety use is needed at 700 MHz, but this should not come at the expense of losing local RPC flexibility to choose the mix of wideband and broadband technologies that is appropriate for their particular region. As noted by NPSTC and many others in previous proceedings, RPCs are in the best position to understand local public safety needs and capabilities, particularly with regard to system coverage requirements and licensees' budget capabilities.

To reiterate the short reply comments filed by Region 49 in the *700 Public Safety 8<sup>th</sup> Notice*, "we determined that the need for differing amounts of wideband and broadband spectrum varies just between the different counties in our 30-county region."

The need for local flexibility in public safety communications is also underscored by the ongoing experiences occurring in the current 800 MHz rebanding process. The variety, complexity, and specialization that exist in public safety communications systems have become painfully obvious. Certainly, one size does not fit all in meeting public safety's communications needs.

Since the Commission believes that allowing local flexibility in the current 700 MHz public safety allocation would hinder the development of a nationwide broadband network, it follows, then, that the nationwide broadband network should be placed in other 700 MHz spectrum that does not deny local flexibility and choice to all 55 local regions.

Furthermore, I believe that it is poor public policy for the Commission to renege on the promise of wideband availability at 700 MHz. Public safety planners and manufacturers have responded to this promised availability since 1998 by developing wideband technology and standards to meet an identified public safety need that has not diminished during the intervening years.

Discarding this investment of time, energy, and financial resources, made, in good faith, by many public safety planners and at least one manufacturer will result in a long-lasting disincentive throughout the industry, should the need to develop another new technology for public safety arise again in the future.

Respectfully submitted,

Ronald G. Mayworm  
P. O. Box 1585  
Bryan, TX 77806  
ron@ktsignals.com